

RECEIVED

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CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SUNPOWER CORPORATION, *et al.*,¹

Wind-Down Debtor.

Chapter 11

Case No. 24-11649 (CTG)

Hearing Date: April 22, 2025 at 10:00 a.m. (EDT)

Response Deadline: April 11, 2025 at 4:00 p.m. (EDT)

**RESPONSE TO NOTICE OF "THE PLAN ADMINISTRATOR'S TENTH OMNIBUS
OBJECTION TO CERTAIN LATE CLAIMS AND AMENDED AND REPLACED
CLAIMS (NON-SUBSTANTIVE)" AND HEARING THEREON**

Docket No. 1408
Response by:
4/11/25

23. Content of Responses: Every Response to the Objection must contain, at a

minimum, the following:

- a. a caption setting forth the name of the Court, the above-referenced case number, and the title of the Objection to which the Response is directed;]

See Above

- b. the name of the claimant and description of the basis for the amount of the Disputed Claim;

Claimant: KOALA INSULATION OF DENVER NORTH
17572 E 98TH Way
COMMERCE CITY, CO 80022-7162

Claim #: 12597

Basis for Amount of Disputed Claim: Insulation repair work was completed at the request of Blue Raven Solar, LLC with charges and late fees for the work completed totaling \$1,220.17

- c. a concise statement setting forth the reasons why a particular Disputed Claim should not be disallowed for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at the Hearing (as such term is defined below);

Collection efforts were made after work was completed in May 2024. I made numerous attempts throughout the year to collect the past due amount. I was notified in August 2024 (via phone call) that there was a pending internal acquisition, and they would be in touch if/when they would be paying the invoice, and to no longer send emails to collect payments. I received an email on Dec 20, 2024 notifying me that I would be paid that day (Dec 20, 2024). No payment was received electronically (as mentioned) or via check. I then reached out again asking about payment, and was notified there was a bankruptcy filing and I 'should have been sent a link', which I had not. The link was sent to file a claim, and I did so within 2 business days of the notice (Feb 2025).

- d. all documentation or other evidence of the Claim in question, to the extent not already included with the claimant's proof of claim, upon which the claimant will rely in opposing the Objection at the Hearing;

Included with Response

- e. the name, address, telephone number, and fax number of the person(s) (who may be the claimant or a legal representative thereof) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on behalf of the claimant; and

Claimant:
Corrie Morley, 17572 E 98th Way, Commerce City, CO 80022
303-912-8865
cmorley@koala insulation.com

- f. the name, address, telephone number, and fax number of the person(s) (who

may be the claimant or a legal representative thereof) to whom the Plan Administrator should serve any reply to the Response.

Direct Responses to:
 Corrie Morley, 17572 E 98th Way, Commerce City, CO 80022
 303-912-8865
 cmorley@koala-insulation.com

Correspondence

Correspondence

Conversation

To

From

Emailed invoice and
 photos of completed
 work

5/16/2024 Nick Wilson

outsourcing@blueravensolar.com
outsourcing@blueravensolar.com

Nick Wilson

Corrie Morley

5/24/2024 Nick Wilson
 Vincenzo

support@blueravensolar.com
support@blueravensolar.com

following up on payment
 onboarding contract and

Nick Wilson

Corrie Morley

6/5/2024 Gunson

support@blueravensolar.com

W9 requirements

Corrie Morley

Vincenzo Gunson

6/6/2024 Gunson

support@blueravensolar.com

returned paperwork

Vincenzo Gunson

Corrie Morley

6/11/2024 Gunson
 Vincenzo

support@blueravensolar.com
support@blueravensolar.com

contractor agreement

Corrie Morley

Vincenzo Gunson

6/11/2024 Gunson
 Vincenzo

support@blueravensolar.com
support@blueravensolar.com

contractor agreement -
 signed

Vincenzo Gunson

Corrie Morley

phone call letting me
 know they were unsure if
 payment would be
 submitted due to pending
 internal legal
 action/business

8/14/2024

non-standard@blueravensolar.com
non-standard@blueravensolar.com

Acquisition

Corrie Morley

email subject line :

DSO Do Not

Notification of Payment

2024-12-20

Corrie Morley

Reply<donotreply-

Body of email : Hello--

dso@blueravensolar.com>

Please see below for a list
 of all payments being
 processed by Blue Raven
 Solar for you today.
 Please note that this
 email was sent from an
 unmonitored inbox, and
 the Non Standard team
 was CC'd. If you have
 questions, make sure to
 ReplyAll, or just email the
 Non Standard team
 directly. Thank you!

ProjectNameWork Type
 InvoiceNumberDollar

Amount
Jose A Avila Final Invoice

- Other 243 1075

	<u>non-</u>	no payment received, so <u>non-</u>	
Non Standard	<u>standard@blueravensolar</u>	emailed asking about	<u>standard@blueravensolar</u>
1/26/2025 Team	<u>.com</u>	payment	<u>.com</u>
	<u>non-</u>	response from Adam	<u>non-</u>
	<u>standard@blueravensolar</u>	Carlson, the invoice had	<u>standard@blueravensolar.</u>
2/20/2025 Adam Carlson	<u>.com</u>	been paid	<u>om</u>
	<u>non-</u>		<u>non-</u>
	<u>standard@blueravensolar</u>		<u>standard@blueravensolar.</u>
2/21/2025 Adam Carlson	<u>.com</u>	Hello Corrie,	<u>om</u>
		I will verify the status on	
		this with accounting. If it	
		has not been paid its	
		likely due to the pre	
		petition bankruptcy. You	
		should have been sent a	
		link awhile back to file for	
		the payment through an	
		outside party that was	
		mandated to pay back	
		some of the SunPower	
		debts via the courts.	
	<u>non-</u>		<u>non-</u>
	<u>standard@blueravensolar</u>		<u>standard@blueravensolar</u>
2/21/2025 Adam Carlson	<u>.com</u>	Hello,	<u>om</u>
		Blue Raven Solar is not	
		going to be paying this	
		due to the decisions	
		made in court during the	
		purchase process by our	
		new parent company. If	
		you follow the steps on	
		this link, you will be able	
		to file a claim for the	
		payment.	
		Link: SunPower	
		Corporation Bankruptcy	

| Epiq

SunPower Corp

Bankruptcy Link

Completed

Corrie Morley

2/23/2025


Koala Insulation of Denver North & SE Denver

Jose Avila
1149 Douglas Dr
Denver, CO 80221

☎ (720) 822-7745
✉ jose.avila0403@icloud.com

JOB	#243
SERVICE DATE	May 14, 2024
INVOICE DATE	May 13, 2024
PAYMENT TERMS	Upon receipt
AMOUNT DUE	\$1,220.17

CONTACT US

6185 E 56th Ave, Unit H
Commerce City, CO 80022

☎ (720) 824-6030
✉ denvernorth@koalainsulation.com

Service completed by: Uriel Dominguez, Jose Cervantes

INVOICE

Services	qty	unit price	amount
Blown-In Insulation - Fiberglass	1.0	\$1,075.00	\$1,075.00
R49 Insulation Service			
Fiberglass Blown-In insulation service. Install fiberglass blown-in insulation to achieve up to Up to R-49 (16.5" nominal depth) across all attic floor space which overlies conditioned living space. Attic is currently insulated with an average of 11" of loose fill fiberglass insulation with estimated R-value of R-29. Depth gauges to be installed to verify insulation depth throughout attic.			
Interest	1.0	\$16.13	\$16.13
Past Due Invoice Interest June 14, 2024			
Interst	1.0	\$16.13	\$16.13
Past Due Invoice Interest July 14, 2024			
Interest	1.0	\$16.13	\$16.13
Past Due Invoice Interest August 14, 2024			
Interest	1.0	\$16.13	\$16.13
Past Due Invoice Interest September 14, 2024			
Interest	1.0	\$16.13	\$16.13
Past Due Invoice Interest October 14, 2024			
Interest	1.0	\$16.13	\$16.13
Past Due Invoice Interest November 14, 2024			
Interest	1.0	\$16.13	\$16.13

Past Due Invoice Interest
December 14, 2024

Interest	1.0	\$16.13	\$16.13
Past Due Invoice Interest January 14, 2025			

Interest	1.0	\$16.13	\$16.13
Past Due Invoice Interest February 14, 2025			

Subtotal	\$1,220.17
-----------------	------------

Job Total	\$1,220.17
------------------	------------

Amount Due	\$1,220.17
-------------------	------------

DELIVERING EFFICIENCY. IMPROVING COMFORT!

Koala insulation provides full coverage, high-performance insulation services. Outstanding workmanship backed by our satisfaction guarantee and Limited Lifetime Warranty

****Estimate pricing is valid for 30 days unless otherwise noted****

Remit Checks/Payments to:
Koala Insulation of Denver North
6401 Broadway, Ste K
Denver, CO 80221

See our [Terms & Conditions](#)



Outlook

SunPower Corporation Claim Confirmation

From filingconfirmation@epiqglobal.com <filingconfirmation@epiqglobal.com>

Date Sun 2/23/2025 4:30 PM

To Corrie Morley <cmorley@koalainsulation.com>

This email was automatically generated to notify you that your claim entry for SunPower Corporation has been completed.

Your claim number is 0000012597 filed on 2/23/2025 6:30:05 PM Eastern.

To log into your account Dashboard and view/print your claim or to submit another entry [www.epiqworkflow.com//cases/SPX]click here.

Please do not reply to this email.

This communication (including any attachment(s)) is intended solely for the recipient(s) named above and may contain information that is confidential, privileged or legally protected. Any unauthorized use or dissemination of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender by return e-mail message and delete all copies of the original communication to include any copy that may reside in your sent box. Thank you for your cooperation.



Outlook

Ticket Updated - [EXT] Re: Notification of Payment 2024-12-20

From Non-Standard Work <non-standard@blueravensolar.com>**Date** Fri 2/21/2025 12:45 PM**To** Corrie Morley <cmorley@koalainsulation.com>

Hi Corrie,

There is a new comment on your ticket. You can reply to this email to add your comment.

Ticket comment:

Adam Carlson –

Hello,

Blue Raven Solar is not going to be paying this due to the decisions made in court during the purchase process by our new parent company. If you follow the steps on this link, you will be able to file a claim for the payment.

Link: [SunPower Corporation Bankruptcy Overview Case: 24-11649 | Epig](#)

From: Non-Standard Work <non-standard@blueravensolar.com>**Sent:** Friday, February 21, 2025 12:28 PM**To:** ASC - Adam Carlson <adam.carlson@blueravensolar.com>**Subject:** Ticket re-opened - [#413757] [EXT] Re: Notification of Payment 2024-12-20

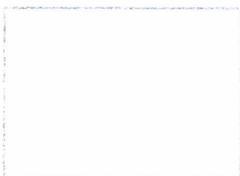
Hi Adam Carlson,

Ticket "#413757 – [EXT] Re: Notification of Payment 2024-12-20" has been reopened, please visit <https://support.blueravensolar.com/helpdesk/tickets/413757> to view the ticket.

Ticket comment

I have not received any links, only email and phone communication prior to the notice of the bankruptcy filings.

This project was completed in April 2024, so WELL before any filings or additional action.

**Corrie Morley**

Owner | Koala Insulation Denver North & Southeast Denver



303-912-8865

cmorley@koalainsulation.comwww.koalainsulation.com

From: Non-Standard Work <non-standard@blueravensolar.com>

Sent: Friday, February 21, 2025 12:24 PM

To: Corrie Morley <cmorley@koalainsulation.com>

Subject: Ticket Updated - [EXT] Re: Notification of Payment 2024-12-20

Hi Corrie,

There is a new comment on your ticket. You can reply to this email to add your comment.

Ticket comment:

Adam Carlson –

Hello Corrie,

I will verify the status on this with accounting. If it has not been paid its likely due to the pre petition bankruptcy. You should have been sent a link awhile back to file for the payment through an outside party that was mandated to pay back some of the SunPower debts via the courts.

From: Non-Standard Work <non-standard@blueravensolar.com>

Sent: Friday, February 21, 2025 10:01 AM

To: ASC - Adam Carlson <adam.carlson@blueravensolar.com>

Subject: Ticket re-opened - [#413757] [EXT] Re: Notification of Payment 2024-12-20

Hi Adam Carlson,

Ticket "#413757 – [EXT] Re: Notification of Payment 2024-12-20" has been reopened, please visit

<https://support.blueravensolar.com/helpdesk/tickets/413757> to view the ticket.

Ticket comment

This has not been paid, and is past due with late fees, so this balance is no longer accurate.

Corrie Morley

Owner

Koala Insulation of Denver North & Southeast Denver

303-912-8865

[[<http://www.koalainsulation.com>%C2%A0]www.koalainsulation.com]jh

<http://www.koalainsulation.com>%C2%A0]www.koalainsulation.com

From: Non-Standard Work <non-standard@blueravensolar.com>

Sent: Friday, February 21, 2025 9:20:58 AM

To: Corrie Morley <cmorley@koalainsulation.com>

Subject: Ticket Updated - [EXT] Re: Notification of Payment 2024-12-20

Hi Corrie,

There is a new comment on your ticket. You can reply to this email to add your comment.

Ticket comment:

Adam Carlson –

Hello Corrie,

Are system shows that you should have been paid. If it has not I can look into it for you.

From: Non-Standard Work <non-standard@blueravensolar.com>

Sent: Thursday, February 20, 2025 8:46 AM

To: ASC - Adam Carlson

<adam.carlson@blueravensolar.com>

Subject: Ticket Assigned - [EXT] Re: Notification of Payment 2024-12-20

Hi Adam Carlson,

A new ticket has been assigned to you.
Please follow the link below to view the ticket.

[EXT] Re: Notification of Payment 2024-12-20

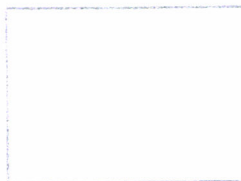
Warning: External Email - Exercise caution when responding due to potential social engineering and phishing threats. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I received this email over a month ago, and still have not received payment.

The amount noted is also 90+ days past due and has accrued interest. How do I submit the updated amount based on the lack of payment from a project completed in April 2024?

Corrie Morley

Owner | Koala Insulation Denver North



☐ 303-912-8865
☐ cmorley@koalainsulation.com
☐ www.koalainsulation.com

From: DSO Do Not Reply <donotreply-dso@blueravensolar.com>
Sent: Friday, December 20, 2024 12:01 PM
To: Corrie Morley
<cmorley@koalainsulation.com>
Cc: Non-Standard <non-standard@blueravensolar.com>
Subject: Notification of Payment 2024-12-20

Hello-- Please see below for a list of all payments being processed by Blue Raven Solar for you today. Please note that this email was sent from an unmonitored inbox, and the Non Standard team was CC'd. If you have questions, make sure to Reply All, or just email the Non Standard team directly. Thank you!

Project Name	Work Type	Invoice Number	Dollar Amount
Jose A Avila	Final Invoice - Other	243	1075

<https://support.blueravensolar.com/helpdesk/tickets/413757>

Sincerely,
Blue Raven Solar Support Team
Ticket: 413757

Sincerely,
Blue Raven Solar Support Team
Ticket: 413757

Sincerely,

Blue Raven Solar Support Team

Ticket: 413757



Outlook

Ticket Received - [EXT] Re: Notification of Payment 2024-12-20

From Non-Standard Work <non-standard@blueravensolar.com>

Date Sun 1/26/2025 6:21 PM

To Corrie Morley <cmorley@koalainsulation.com>

Hi Corrie,

We would like to acknowledge that we have received your request and a ticket has been created. The ticket number is: 413757.

A support representative will be reviewing your request and will send you a response shortly.

Thank you for your patience.

Sincerely,
Blue Raven Solar Support Team

Ticket: 413757



Outlook

Notification of Payment 2024-12-20

From DSO Do Not Reply <donotreply-dso@blueravensolar.com>

Date Fri 12/20/2024 12:02 PM

To Corrie Morley <cmorley@koalainsulation.com>

Cc Non-Standard <non-standard@blueravensolar.com>

Hello-- Please see below for a list of all payments being processed by Blue Raven Solar for you today. Please note that this email was sent from an unmonitored inbox, and the Non Standard team was CC'd. If you have questions, make sure to Reply All, or just email the Non Standard team directly. Thank you!

Project Name	Work Type	Invoice Number	Dollar Amount
Jose A Avila	Final Invoice - Other	243	1075



Outlook

Re: Re: Koala Insulation - Onboarding Information Preferred Contractor for Blue Raven Solar

From Blue Raven Solar <support@blueravensolar.com>

Date Tue 6/11/2024 2:51 PM

To Corrie Morley <cmorley@koalainsulation.com>

Thanks for sending those over!

You can review and sign the subcontractor agreement at the following link:

<https://app.pandadoc.com/document/4cd1df6e8b2b5f4dbb784e68c4525fb9d190cbe6>

Let me know when that is complete and I will get this submitted!

Thanks,

Vincenzo Gunson

Work Orders Lead

385.265.2270

work.orders@blueravensolar.com

On Thu, 6 Jun at 4:01 PM , Corrie Morley <cmorley@koalainsulation.com> wrote:

Thank you for forwarding these details and information. I have attached our COI, W9, direct deposit form (both bank and Blue Raven copies).

- Does your company require any down payments? On projects over \$5000. We can do a 20% and net 30 if that works best, otherwise default terms are due upon job completion.
- Does your company require any documents to be signed before work can start? We like to have an 'approval' on the estimates, although an approval in writing via email is sufficient.



Corrie Morley

Owner | Koala Insulation Denver North



303-912-8865



cmorley@koalainsulation.com



www.koalainsulation.com

From: Outsourcing <outsourcing@blueravensolar.com>

Sent: Wednesday, June 5, 2024 4:55 PM

To: Corrie Morley <cmorley@koalainsulation.com>

Subject: Koala Insulation - Onboarding Information Preferred Contractor for Blue Raven Solar

Hello,

We spoke on the phone regarding becoming an onboarded contractor. We are looking forward to working with you! To add your company to our system, which allows us to approve quotes and provide payments, we will need a few documents to get you set up. The following documents or information are required:

- W9 - Certificate of Insurance - Including workers comp or a reason for exemption
- Our subcontractor agreement reviewed and signed (I can send this to you once I have your legal business name as printed on your W9)
- Filled out ACH form (attached). We pay by ACH direct deposit- these payments make it to you much faster than payment by check.
- Does your company require any down payments?
- Does your company require any documents to be signed before work can start?
- Lastly, are your employees paid via W2 or 1099? If they are paid by W2, we will need proof of workers comp.

Please return this information to us at your earliest convenience.

Please do not move forward on any work, including projects in the future, without receiving confirmation from the Work Orders department that we have approved the quote and are ready to move forward. This will always be given in writing, usually through email. This process helps us ensure that we have the right work being performed, as well as the financing set up for you.

If you have any questions or concerns, please feel free to contact us by replying to this email, or by calling us at (385) 265-2270. We look forward to hearing back from you shortly!

Thanks,

Vincenzo Gunson

Work Orders Lead

385.265.2270

work.orders@blueravensolar.com



Outlook

Re: Re: Quote Requested (Jose A Avila) - (910429)

From Outsourcing <outsourcing@blueravensolar.com>**Date** Mon 5/13/2024 10:46 AM**To** Corrie Morley <cmorley@koalainsulation.com>

Hi Corrie!

Sounds great! I will be waiting for that invoice until then!

Thanks a ton!

Nick Wilson | Work Orders Coordinator | Work Orders | **Blue Raven Solar** | 385-265-2270

On Mon, 13 May at 10:28 AM , Corrie Morley <cmorley@koalainsulation.com> wrote:
Hi Nick,

Thanks for sending this over! We have him scheduled for tomorrow morning.

We'll send over photos and the invoice once it's complete.

Thank you,

**Corrie Morley**

Owner | Koala Insulation Denver North



303-912-8865

cmorley@koalainsulation.comwww.koalainsulation.com

From: Outsourcing <outsourcing@blueravensolar.com>**Sent:** Friday, May 10, 2024 10:50 AM**To:** Corrie Morley <cmorley@koalainsulation.com>**Subject:** Re: Re: Quote Requested (Jose A Avila) - (910429)

Hi Corrie!

Thank you for getting back to me with this quote.

We are approving the quote amount of \$1075 for the insulation repair on this home. Please reach out to the homeowner, Jose A Avila, for scheduling.

Once the work is scheduled, please let me know so I can mark it on my end.

Best,

Nick Wilson | Work Orders Coordinator | Work Orders | **Blue Raven Solar** | 385-265-2270

On Mon, 22 Apr at 11:11 AM , Blue Raven Solar
<support@blueravensolar.com> wrote:
Hi Corrie!

Sorry for not getting back to you yet! I'm still working on getting a 2nd quote per my supervisors' request but if this company that I'm trying to get in touch with does not respond to me I will try to push the quote you sent forward through. You should expect an answer from me by next week.

Thank you!

Nick Wilson | Work Orders Coordinator | Work Orders | **Blue Raven Solar** | 385-265-2270

On Mon, 22 Apr at 11:05 AM , Corrie Morley
<cmorley@koalainsulation.com> wrote:
Hi Nick,

Were you able to get Mr. Avila taken care of, or would you like to schedule with us?

Corrie Morley
Owner
Koala Insulation of Denver North
303-912-8865
[<http://www.koalainsulation.com%C2%A0www.koalainsulation.com>]

F

\$11.26 US POSTAGE
FIRST-CLASS IMI
Apr 08 2025
Mailed from ZIP 80022
4 OZ FIRST-CLASS MAIL FLAT RATE
ZONE 7
10098855



06380010282497

FIRST-CLASS MAIL

C012

Corrie Morley
17572 E 98TH WAY
COMMERCE CITY CO 80022

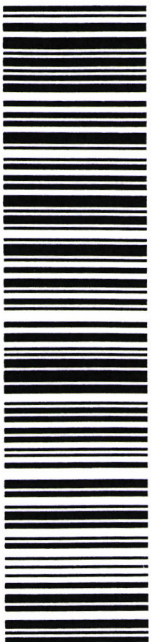
Shipped using PostalMate
Pkg:252586

RETURN RECEIPT REQUESTED

SHIP Office of the Clerk of the US Bankruptcy Court
TO: District of Delaware
824 North Market Street 3rd Fl
WILMINGTON DE 19801



USPS CERTIFIED MAIL



9414 7118 9956 0163 5858 11



UNITED STATES POSTAL SERVICE

CERTIFIED MAIL

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For export control and
import administration
HSD R 0173